

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

IN RE: NEW ENGLAND
COMPOUNDING PHARMACY, INC.
PRODUCTS LIABILITY LITIGATION

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MDL No. 2419
Dkt. No. 1:13-md-2419-RWZ

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This Document Relates to:

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Berry v. STOPNC, LLC, *et al.*
Dkt. No.: 1:13-cv-12838-RWZ

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**Notice of Stipulation of Extension of Time to
Respond to the PSC's Motion to Compel [Doc. 2570]**

Defendants Saint Thomas Outpatient Neurosurgical Center, LLC; Howell Allen Clinic, a Professional Corporation; John Culclasure, MD; and Debra Schamberg, RN, CNOR, (collectively, "STOPNC Defendants") hereby give notice to this honorable Court and all parties that, consistent with MDL Order 11 [Doc. 1524], the STOPNC Defendants, and the PSC (the "Impacted Parties" with regard to this motion) have agreed that the STOPNC Defendants shall have through February 5, 2016, to file a written response to the PSC's Motion to Compel [Doc. 2570]. The parties are in the process of meeting and conferring to attempt to resolve or narrow the issues before the Court. This is the first extension for response to this motion.

Respectfully submitted with consent of
the PSC,

GIDEON, COOPER & ESSARY, PLC

/s/ Chris J. Tardio

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* Admitted pursuant to MDL Order No. 1.

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CERTIFICATE OF SERVICE

I hereby certify that this document filed through the CM/ECF system will be served electronically to the registered participants identified on the Notice of Electronic Filing this 26th day of January, 2016.

/s/ Chris J. Tardio

Chris J. Tardio